REMARKS/ARGUMENTS

1.) Claim Rejections – 35 U.S.C. § 103

Claims 12-21 stand rejected under 35 U.S.C. § 103 as being obvious over Schroder, *et al.* (US 7,107,329A) (hereinafter, Schroder) in view of Hanselmann (US 7,116,634). Applicant respectfully disagrees.

Schroder discloses a method and system for imperceptibly upgrading router node software and the like without traffic interruption. Schroder discloses the preparation of upgraded software in a router while that router continues to forward data under the control of its original software, and then swapping the upgraded software for the original software without disruption. (Schroder, Abstract)

Hanselmann discloses facilitating recovery of a data connection that was established between an active router and a host. The data connection is a type of connection that tracks the sequence of data sent between the router and the host. This recovery may occur after a standby router takes over for the active router. For example, a Transmission Control Protocol (TCP) connection between the active router and a host may be recovered after a router switchover (e.g., when the standby router takes over for the active router in a hot standby router protocol system). To accomplish this, at least one sequence number that is associated with data sent from the active router (to the host) is sent to the standby router, and at least one sequence number from data sent from the host is also sent to the standby router. For example, the sequence numbers correspond to the initial SYN packet sent by the active router and the SYN packet sent by the host in response to the active router's SYN packet. These two sequence numbers are obtained for each connection in which the active router is an endpoint. When the standby takes over for the previously active router, the new active router may then recover the connection by sending these two sequence numbers within an acknowledgement packet to the host. The host then responds with the correct sequence numbers for the connection, and the standby router can then continue data transmission to the host using the correct sequence numbers. (Hanselmann, Abstract)

The Examiner's attention is directed to the fact that Schroder and Hanselmann fail to teach, disclose, or suggest "finding a configuration sequence of target routers associated with said target objects that provides continuous connectivity to said management centre", as recited in independent claims 12 and 17. Independent claims 12 and 17 recite:

12. A method for managing configuration of a network in a management centre, said network having a plurality of target objects, said method comprising:

elaborating a model of the network to be managed;

identifying a plurality of target objects to be configured in the network;

validating the changes to be made upon configuration of said plurality of target objects; and, if all changes have been validated:

finding a configuration sequence of target routers associated with said target objects that provides continuous connectivity to said management centre; and

configuring each of said target routers. (emphasis added)

17. An apparatus for managing configuration of a network, said apparatus being located in a management centre, said network having a plurality of target objects, said apparatus comprising:

means for elaborating a model of the network to be managed;

means for identifying a plurality of target objects to be configured in the network;

means for validating the changes to be made upon configuration of said plurality of target objects;

means for finding a configuration sequence of target routers associated with said target objects that provides continuous connectivity to said management centre; and

means for configuring each of said target routers. (emphasis added)

The present invention, in one embodiment, discloses managing configuration of a network in a management centre, the network having a plurality of target objects, remarkable in that it comprises: elaborating a model of the network to be managed; identifying a plurality of target objects to be configured in the network; validating the changes to be made upon configuration of the plurality of target objects; and, if all changes have been validated: finding a sequence of target routers that provides continuous connectivity to the management centre; and configuring each of the target routers. Thus, thanks to the present invention, the network administrator can concentrate on actual network-wide object management instead of complex and time-consuming distributed, per-element implementation.

In contrast, Schroder is related only to operations on a single router and is not concerned with the relation among routers, e.g., the topology of the network. As such, Schroder also fails to teach a management centre as recited in the claims since Schroder is only concerned with forwarding traffic for a single router while that single router receives a software upgrade. Schroder, in the passage cited by the Examiner, discloses interruption of service in order to upgrade/reload software and a "hot swap" of software. Neither technique described in Schroder teaches the limitations of Applicant's claims. Namely, Schroder fails to at least teach "finding a configuration sequence of target routers...".

The present invention, as recited in independent claims 12 and 17 is concerned, in one embodiment, with the finding a configuration **sequence** of target routers in order to maintain continuous connectivity to the management center. In Schroder, no such configuration sequence of target routers is taught, disclosed, or suggested. In fact, it can be said that Schroder teaches away from finding a configuration sequence of target routers since Schroder is only concerned with swapping old software for new software in a router without disrupting traffic flowing through that single router.

In addition, the Examiner concedes that Schroder fails to teach "finding a configuration sequence of target routers associated with said target objects that provides continuous connectivity to said management centre." See Office Action,

Section 3, paragraph 3. In order to cure the Examiner's perceived deficiency of Schroder, Hanselmann is cited.

Applicant respectfully disagrees with the Examiner's characterization of the Hanselmann reference. Hanselmman discloses a sequence number associated with **data**, where the sequence number of the **data** is used by an active router and a standby router in order to recover a data connection. See Hanselmann, Abstract. Applicant's claims recite a configuration sequence of target routers **not** a sequence number of data as taught by Hanselmann. Clearly, Hanselmann does not teach what is recited by Applicant's claims. As such, Schroder and Hanselmann, in any permissible combination fail to teach, disclose, or suggest what is recited by Applicant' s independent claims 12 and 17.

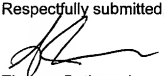
In view of the above arguments, Applicant respectfully asserts that independent claims 12 and 17 are patentable over the cited art. Claims 13-16 and 18-21 are patentable at least by virtue of depending from their respective base claims. Therefore, the allowance of claims 12-21 is respectfully requested.

CONCLUSION

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,



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